

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

PINEBRIDGE INVESTMENTS PARTNERS LLC
and PINEBRIDGE GEM II, LTD.,

Plaintiffs,

-against-

ABDÜLAZIZ GEYLAN ZAPSU,

Defendant.

Civil Action No. _____

**DECLARATION OF NANCY CHUNG IN SUPPORT OF APPLICATION FOR AN
ORDER TO FILE UNDER SEAL**

I, Nancy Chung, declare as follows:

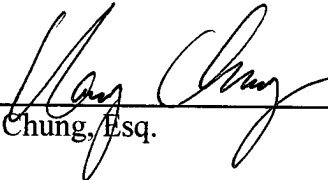
1. I am a partner of the law firm of Akin Gump Strauss Hauer & Feld LLP, counsel for Plaintiffs PineBridge Investments Partners LLC and PineBridge GEM II, Ltd. in the above-referenced matter. I respectfully submit this Declaration in Support of Plaintiffs' application for an Order to File Under Seal.

2. The Complaint, the exhibits attached thereto, the Plaintiffs' Motion for a Preliminary Injunction and the documents and exhibits submitted therewith contain confidential information, including pleadings and correspondence, submitted in an ongoing ICC arbitration proceeding captioned *Abdulaziz Geylan Zapsu vs. PineBridge Global Emerging Markets Partners II, L.P., et al.*, ICC Case No. 20262/AGF/ZF. Copies of each the above are annexed hereto. Under applicable law governing the arbitration, nonpublic materials submitted in arbitral proceedings are presumed to be confidential absent the consent of the parties.

3. The Plaintiffs have not previously applied for similar relief.

I declare under the penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: August 13, 2014
New York, New York



Nancy Chung, Esq.